



Court, need to make an electronic appearance through the Court's website at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl> **on or before 4:00 p.m. (prevailing Eastern Time) on August 11, 2023.**

Due to the large number of expected participants in the Hearing and the Court's security requirements for participating in a Zoom for Government audio and video hearing, all persons seeking to attend the 10:00 a.m., August 14, 2023 (prevailing Eastern Time) Hearing must connect to the Hearing beginning at 9:00 a.m., August 14, 2023 (prevailing Eastern Time). When parties sign into Zoom for Government and add their names, they must type in the first and last name that will be used to identify them at the Hearing. Parties that type in only their first name, a nickname or initials will not be admitted into the Hearing. When seeking to connect for either audio or video participation in a Zoom for Government Hearing, you will first enter a "Waiting Room," in the order in which you seek to connect. Court personnel will admit each person to the Hearing from the Waiting Room after confirming the person's name (and telephone number, if a telephone is used to connect) with their eCourtAppearance. Because of the large number of expected participants, you may experience a delay in the Waiting Room before you are admitted to the Hearing.

Copies of Motions: A copy of each pleading may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Celsius>. You may also obtain copies of any pleadings by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

## **I. Contested Matters.**

1. **Motion to Approve Settlement.** Joint Motion for Entry of an Order (I) Approving the Settlement by and Among the Debtors and the Committee with Respect to the Committee's Class Claim and (II) Granting Related Relief [Docket No. 3064].

Objection Deadline: August 3, 2023, at 4:00 p.m. (prevailing Eastern Time).

### Responses Received:

- (1) Response of Ignat Tuganov in Support of the Joint Motion for Entry of an Order (I) Approving the Settlement by and Among the Debtors and the Committee with Respect to the Committee's Class Claim and (II) Granting Related Relief [Docket No. 3144].
- (2) Santos Caceres' Limited Objection to the Debtors' Entry for an Order (I) Approving the Settlement by and among the Debtors and the Committee

with Respect to Committee Class Claim (II) Granting Related Relief [Docket No. 3170].

- (3) The Official Committee of Unsecured Creditors' (I) Joinder to the Debtors' Reply and (II) Response to Objections to and Statement in Further Support of the Debtors' Disclosure Statement Motion and the Settlement Motion [Docket No. 3226].

Related Documents:

- (1) Notice of Filing of Class Claim Settlement Agreement [Docket No. 3138].
- (2) Notice of Rescheduled Hearing Date [Docket No. 3219].
- (3) Debtors' Omnibus Reply in Support of the Adequacy of the Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket No. 3225].

**Status:** This matter is going forward.

2. **Motion to Approve Disclosure Statement.** Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Debtors' Disclosure Statement, (II) Approving the Solicitation and Voting Procedures with Respect to Confirmation of the Debtors' Joint Plan of Reorganization, (III) Approving the Form of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, (V) Authorizing and Approving Reimbursement of Certain of the Plan Sponsor's Fees and Expenses, and (VI) Granting Related Relief [Docket No. 2970].

Objection Deadline: August 3, 2023, at 4:00 p.m. (prevailing Eastern Time).

Responses Received:

- (1) Motion to Object to the Debtor's Disclosure Statement, Motion to Join Joshua Cole's Secured Creditor and Relief from Automatic Stay Motion, and Competing Chapter 11 Plan Proposal [Docket No. 3061].
- (2) (I) Objection to the Adequacy of the Disclosure Statement in Regards to CEL Token Subordination Under Rule 510(b) (II) Request for Relief in Declaring the CEL Token Not a Security and (III) Request for the Formation of a CEL Token Class with Professionals Paid for by the Estate [Docket No. 3084].
- (3) Jason Iovine Letter Objection [Docket No. 3122].
- (4) Carol Maunder Letter Objection [Docket No. 3123].

- (5) Santos Caceres' Limited Objection to the Debtors' Entry for an Order (I) Approving the Adequacy of the Disclosure Statement in Regards to the Treatment of Non-Insider CEL Token Claims (II) Granting Related Relief [Docket No. 3124].
- (6) James DeNash Letter Objection [Docket No. 3125].
- (7) Brian Peel Letter Objection [Docket No. 3139].
- (8) Joshua Nguyen Letter Objection [Docket No. 3140].
- (9) Ad Hoc Group of Withhold Account Holders and Other Transferees' Statement and Reservation of Rights with Respect to the Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Debtors' Disclosure Statement, (II) Approving the Solicitation and Voting Procedures with Respect to Confirmation of the Debtors' Joint Plan of Reorganization, (III) Approving the Form of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, (V) Authorizing and Approving Reimbursement of Certain of the Plan Sponsor's Fees and Expenses, and (VI) Granting Related Relief [Docket No. 3146].
- (10) Securities Plaintiffs' Limited Objection to Approval of the Disclosure Statement and Solicitation Procedures Relating to the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates [Docket No. 3149].
- (11) Reservation Of Rights of the U.S. Securities and Exchange Commission to Debtors' Motion for Entry of an Order Approving Disclosure Statement and Related Relief [Docket No. 3150].
- (12) Limited Objection and Reservation of Rights by AM Ventures Holdings Inc. to Approval of Revised Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates (ECF Doc. No. 3117) [Docket No. 3153].
- (13) Objection to Motion to Approve Disclosure Statement [Docket No. 3154].
- (14) Limited Objection and Reservation of Rights by Koala1 LLC to Approval of Revised Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates (ECF Doc. No. 3117) [Docket No. 3156].
- (15) Araceli Sanchez Letter Objection [Docket No. 3157].
- (16) Michael Gonzales Letter Objection [Docket No. 3158].

- (17) Reservation of Rights and Comments of Ad Hoc Group of Earn Account Holders to Revised Disclosure Statement to Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates [Docket No. 3159].
- (18) Objection of Harrison Schoenau to Debtors' Request for Approval of Alternative Dispute Resolution Procedures [Docket No. 3161].
- (19) Reservation of Rights of the BRIC in Response to the Debtors' [*sic*] Entry for an Order (I) Approving the Adequacy of the Debtors' Disclosure Statement, (II) Approving the Solicitation and Voting Procedures with Respect to Confirmation of the Debtors' Joint Plan of Reorganization, (III) Approving the Form of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, (V) Authorizing and Approving Reimbursement of Certain of the Plan Sponsor's Fees and Expenses, and (VI) Granting Related Relief [Docket No. 3163].
- (20) Sean StJohn Letter Objection [Docket No. 3164].
- (21) John Hodson Letter Objection [Docket No. 3168].
- (22) Víctor Ubierna de las Heras Objection to Debtors' Motion for Entry of an Order (I) Approving the Debtors' Disclosure Statement (Dk. 2970) [Docket No. 3169].
- (23) (I) Limited Objection to the Adequacy of the Disclosure Statement with Regards to CEL Token Treatment (II) Objection to Santos Caceres' Motion to Certify a Class of Creditors for Non-Insider CEL Token Claim Holders (i) Allowing the Retention of Legal Representation Paid by the Estate (ii) Granting Related Relief [Docket No. 3173].
- (24) Yolande Schaller Letter Objection [Docket No. 3174].
- (25) Sheena Schaller Letter Objection [Docket No. 3175].
- (26) Randy Schaller Letter Objection [Docket No. 3176].
- (27) Francois Schaller Letter Objection [Docket No. 3177].
- (28) Anne-Christine Schwab Letter Objection [Docket No. 3178].
- (29) Limited Objection and Reservation of Rights [Docket No. 3179].
- (30) Limited Objection and Reservation of Rights of the Texas State Securities Board and the Texas Department of Banking to Debtors' Revised Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates [Docket No. 3181].

- (31) Objection of the United States Trustee to Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network, LLC and Its Debtor Affiliates [Docket No. 3182].
- (32) Maria Helioti Letter Objection [Docket No. 3186].\*<sup>2</sup>
- (33) Carla Marshall Letter Objection [Docket No. 3187].\*
- (34) James Foley Letter Objection [Docket No. 3188].\*
- (35) Jason Amerson Letter Objection [Docket No. 3201].\*
- (36) Sean Guilfoyle Letter Objection [Docket No. 3202].\*
- (37) Gabriele Paraboschi Letter Objection [Docket No. 3206].\*
- (38) Eric Kimla Letter Objection [Docket No. 3210].\*
- (39) Erica Amerson Letter Objection [Docket No. 3214].\*
- (40) Viktoria Gorelik Letter Objection [Docket No. 3215].\*
- (41) The Official Committee of Unsecured Creditors' (I) Joinder to the Debtors' Reply and (II) Response to Objections to and Statement in Further Support of the Debtors' Disclosure Statement Motion and the Settlement Motion [Docket No. 3226].
- (42) Andrew Gleeson Letter Objection [Docket No. 3227].\*
- (43) Peter Juiris Letter Objection [Docket No. 3245].\*

Related Documents:

- (1) Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket No. 2358].
- (2) Debtors' Statement Regarding Plan Process [Docket No. 2359].
- (3) Notice of Extended Deadline to File Disclosure Statement [Docket No. 2633].

---

<sup>2</sup> Items affixed with a "\*" were received after the objection deadline of August 3, 2023, at 4:00 p.m. (prevailing Eastern Time).

- (4) Notice of Filing of Revised Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket No. 2807].
- (5) Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket No. 2902].
- (6) Exhibits to Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Debtors' Disclosure Statement, (II) Approving the Solicitation and Voting Procedures with Respect to Confirmation of the Debtors' Joint Plan of Reorganization, (III) Approving the Form of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, (V) Authorizing and Approving Reimbursement of Certain of the Plan Sponsor's Fees and Expenses, and (VI) Granting Related Relief [Docket No. 2971].
- (7) Notice of Hearing to Consider Approval of Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates [Docket No. 2977].
- (8) Notice of Filing of Plan Supplement [Docket No. 3115].
- (9) Second Notice of Filing of Revised Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates [Docket No. 3116].
- (10) Notice of Filing of Revised Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates [Docket No. 3117].
- (11) Letter Request to Extend Deadline to Object to the Adequacy of the Disclosure Statement [Docket No. 3142].
- (12) Letter Request to Extend Deadline to Object to the Adequacy of the Disclosure Statement [Docket No. 3143].
- (13) Amended Notice of Hearing [Docket No. 3185].
- (14) Debtors' *Ex Parte* Motion for Entry of an Order Authorizing the Debtors to Exceed the Page Limit Requirement for the Debtors' Omnibus Reply in Support of the Debtors' Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket No. 3213].
- (15) Notice of Rescheduled Hearing Date [Docket No. 3219].
- (16) Declaration of Christopher Ferraro, Interim Chief Executive Officer, Chief Restructuring Officer, and Chief Financial Officer of the Debtors, in Support of an Order Authorizing and Approving Certain Fees and Expenses for the Plan Sponsor [Docket No. 3220].

- (17) Third Notice of Filing of Revised Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket No. 3222].
- (18) Second Notice of Filing of Revised Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket No. 3223].
- (19) Notice of Filing of Revised Proposed Order (I) Approving the Adequacy of the Debtors' Disclosure Statement, (II) Approving the Solicitation and Voting Procedures with Respect to Confirmation of the Debtors' Joint Plan of Reorganization, (III) Approving the Form of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, (V) Authorizing and Approving Reimbursement of Certain of the Plan Sponsor's Fees and Expenses, and (VI) Granting Related Relief [Docket No. 3224].
- (20) Debtors' Omnibus Reply in Support of the Adequacy of the Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket No. 3225].
- (21) Order Granting the Debtors' *Ex Parte* Motion for Entry of an Order Authorizing the Debtors to Exceed the Page Limit Requirement for the Debtors' Omnibus Reply in Support of the Debtors' Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Celsius Network LLC and its Debtor Affiliates [Docket No. 3228].
- (22) Notice of Filing of Committee Support Letter [Docket No. 3241].

**Status:** This matter is going forward.

- 3. **FTC Stipulation.** Notice of Presentment and Opportunity for Hearing on the Joint Stipulation and Agreed Order Between the Federal Trade Commission and the Debtors to Enter into Stipulated Order in the District Court [Docket No. 3095].

**Objection Deadline:** August 9, 2023, at 4:00 p.m. (prevailing Eastern Time).

**Responses Received:**

- (1) Limited Objection of the Official Committee of Unsecured Creditors to the Joint Stipulation and Agreed Order Between the Federal Trade Commission and the Debtors to Enter into Stipulated Order in the District Court [Docket No. 3136].

**Related Documents:**

- (1) Joint Reply to the Limited Objection by the Official Committee of Unsecured Creditors to the Joint Stipulation and Agreed Order Between the



Federal Trade Commission and the Debtors to Enter into Stipulated Order  
in the District Court [Docket No. 3254].

**Status:** This matter is going forward.

4. **Motion to Serve Subpoena.** Motion Of Terraform Labs Pte Ltd. for Leave to  
Serve Rule 45 Document Subpoena(s) on Debtors [Docket No. 3129].

**Objection Deadline:** August 7, 2023, at 4:00 p.m. (prevailing Eastern Time).

**Responses Received:** None.

**Related Documents:**

- (1) Terraform Labs Pte Ltd.'s Motion for Order Shortening Notice with  
Respect to Motion of Terraform Labs Pte Ltd. for Leave to Serve Rule 45  
Document Subpoena(s) on Debtors [Docket No. 3130].
- (2) Order Granting Terraform Labs Pte Ltd.'s Motion for Order Shortening  
Notice with Respect to Motion of Terraform Labs Pte Ltd. for Leave to  
Serve Rule 45 Document Subpoena(s) on Debtors [Docket No. 3133].
- (3) Notice Of Expedited Hearing on Motion of Terraform Labs Pte Ltd. for  
Leave to Serve Rule 45 Document Subpoena(s) on Debtors  
[Docket No. 3134].
- (4) Order Requiring Additional Briefing Regarding the Motion of Terraform  
Labs Pte Ltd. for Leave to Serve Rule 45 Document Subpoena(s) on Debtors  
[Docket No. 3135].
- (5) Joint Supplemental Brief of the Debtors and Terraform Labs Pte Ltd. in  
Support of/Relation to the Motion of Terraform Labs Pte Ltd. for Leave to  
Serve Rule 45 Document Subpoena(s) on Debtors [Docket No. 3193].
- (6) Notice of Rescheduled Hearing Date [Docket No. 3219].

**Status:** This matter is going forward.

*[Remainder of page intentionally left blank]*

New York, New York  
Dated: August 10, 2023

/s/ Joshua A. Sussberg

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

Joshua A. Sussberg, P.C.

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: joshua.sussberg@kirkland.com

- and -

Patrick J. Nash, Jr., P.C. (admitted *pro hac vice*)

Ross M. Kwasteniet, P.C. (admitted *pro hac vice*)

Christopher S. Koenig

Dan Latona (admitted *pro hac vice*)

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Email: patrick.nash@kirkland.com

ross.kwasteniet@kirkland.com

chris.koenig@kirkland.com

dan.latona@kirkland.com

*Counsel to the Debtors and Debtors in Possession*